

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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*Attorneys for Debtor/Debtor-in-Possession
American Center for Civil Justice, Inc.*

In Re

AMERICAN CENTER FOR CIVIL JUSTICE, INC.,

Debtor.

CHAPTER 11

CASE NO.: 18-15691/CMG

Judge: Hon. Christine M. Gravelle

**MOTION TO QUASH SUBPOENAS SERVED ON THE LAW FIRMS OF LOEB &
LOEB AND CAPLIN & DRYSDALE PURSUANT TO RULE 45, FED. R. CIV. PRO.,
AND BANKRUPTCY RULE 9016**

PLEASE TAKE NOTICE that the American Center for Civil Justice, Inc., by and through their undersigned counsel, will move before the Honorable Christine M. Gravelle, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, for entry of an order quashing or modifying the subpoenas issued to the law firms of Loeb & Loeb, LLP and Caplin & Drysdale, and for such other and further relief as is just and proper under the circumstances (the "Motion").

PLEASE TAKE FURTHER NOTICE that the Movants will rely upon the Certification of Neal Sher, Esq., and exhibits attached thereto, and Memorandum of Law filed simultaneously herewith in support of the relief sought. ·

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d) and the requested

relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9016-l(f) the Movants respectfully request oral argument of the Motion if a timely objection is filed.

Respectfully submitted,

Broege, Neumann, Fischer & Shaver, LLC
Attorneys for Debtor and Debtor-in-Possession
American Center for Civil Justice, Inc.

Dated: January 29, 2019

By: /s/ Timothy P. Neumann
Timothy P. Neumann